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October 18, 2018

VIA ECFS

Ms. Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street, SW
Washington, DC 20554

**Re: *Amendment to the Commission's Rules Concerning Market Modification;
Implementation of Section 102 of the STELA Reauthorization Act of 2014 –
MB Docket No. 15-71***

Dear Ms. Dortch:

Consistent with the Commission's 2015 order in the above-referenced docket,¹ enclosed please find the results of DIRECTV's preliminary evaluation of its spot beam coverage for station WCJB, located in the Gainesville, FL DMA, for purposes of carriage in Columbia and Marion Counties in Florida.

Please contact me should you have any questions.

Respectfully submitted,

/s/ Amanda E. Potter

Amanda E. Potter

Enclosure

¹¹ *Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 (2015).



October 18, 2018

Via FedEx

Robert J. Folliard, III
Vice President & Deputy General Counsel
Gray Television
4370 Peachtree Road, NE
Atlanta, GA 30319

Dear Mr. Folliard:

Please find attached the results of your request for a preliminary evaluation of a potential market modification for **WCJB**.

DIRECTV's engineering staff was given the areas to evaluate for station **WCJB** on our **Gainesville, FL** spot beam, and have found that:

- DIRECTV's HD spot beam does not cover **2** current zip codes in **Columbia County**
- DIRECTV's HD spot beam does not cover **4** current zip codes in **Marion County**

Please see attached for specific spot beam zip code coverage information.

Please note that WCJB currently would qualify under the "duplicating signals" exception to DBS providers' broadcast carriage obligations in Columbia and Marion Counties.¹ Further, DIRECTV notes that the Gainesville, FL DMA, the home DMA for WCJB, has only an HD spot beam for local channels, and customers must have HD equipment in order to receive local stations. As a result, in the event DIRECTV were to carry WCJB in Marion and Columbia Counties, only customers with HD equipment would be able to receive WCJB. Customers with SD equipment would need to obtain HD equipment in order to receive WCJB.

DIRECTV will forward the results of this preliminary evaluation to the FCC for its records. Thank you for your letter and your interest in DIRECTV programming.

Sincerely,

DIRECTV

¹ See 47 U.S.C. § 338(c)(1); 47 C.F.R. § 76.66(h); *Amendment to the Commission's Rules Concerning Market Modification; Implementation of Section 102 of the STELA Reauthorization Act of 2014*, Report and Order, 30 FCC Rcd 10406 ¶ 28 n.146 (confirming that the "duplicating signals" exception continues to apply "to stations in communities that have been added to their markets via the market modification process"); see also *Gray Television Licensee, LLC, for Modification of the Television Market for WYMT-TV, Hazard, Kentucky*, Memorandum Opinion and Order, MB Docket No. 18-8, DA 18-500, ¶¶ 21-22 (MB rel. May 16, 2018).

Form of Certification Regarding Spot Beam Coverage

1. My name is Constance Goshgarian. I am VP Systems Engineering and Architecture at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WCJB	FL	COLUMBIA

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
 - b. Estimated atmospheric effects for reception of the signal.
 - c. Estimated levels of interference.
 - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - e. The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
 - a. Signal availability.
 - b. Clear sky signal margin.
 - c. Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
 - ☐ Can provide service to all the zip codes associated with this request.
 - ☐ Cannot provide service to any of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
 - ☒ Cannot provide service to some of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service. The list of unserved zip codes is attached.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 10/15/18
Date


Signature

Thursday, October 11, 2018

Form of Certification Regarding Spot Beam Coverage

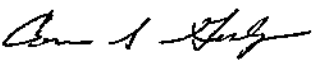
1. My name is Constance Goshgarian. I am VP Systems Engineering and Architecture at DIRECTV. As such, I am responsible for determining service areas for television stations carried on DIRECTV's spot beams.
2. DIRECTV has reviewed the request to add the communities listed below to the local television market for the station indicated.

Station	State	County
WCJB	FL	MARION

3. DIRECTV has analyzed, with respect to each zip code associated with this request, the expected performance against specific performance criteria. The following factors have been included in this analysis:
 - a. The measured performance of the spot beam covering this Television Station's local market.
 - b. Estimated atmospheric effects for reception of the signal.
 - c. Estimated levels of interference.
 - d. The amount of capacity currently used, and reasonably expected to be used, on the spot beam.
 - e. The target availability figure used for all television stations offered on the spot beam.
4. From this analysis, DIRECTV has derived the following metrics, which it has used to evaluate the potential to provide service in the zip code(s) in question:
 - a. Signal availability.
 - b. Clear sky signal margin.
 - c. Total carrier-to- interference ratio.
5. DIRECTV has conducted this analysis in substantially the same manner and using substantially the same parameters used to determine the geographic area in which it currently offers stations carried on the spot beam.
6. Based on this analysis, DIRECTV:
 - ☐ Can provide service to all the zip codes associated with this request.
 - ☐ Cannot provide service to any of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service.
 - ☒ Cannot provide service to some of the zip codes associated with this request because reception of the signal does not meet the minimum performance thresholds for DIRECTV's service. The list of unserved zip codes is attached.

I declare under penalty of perjury that the foregoing is true and correct.

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Thursday, October 11, 2018

Station	Zip	USPSFIPS	State	County	Covered_SD	Covered_HD	Evaluation Completed
WCJB	32055	12023	FL	COLUMBIA	N/A	No	9/21/2018
WCJB	32056	12023	FL	COLUMBIA	N/A	No - PO box - evaluated as 32055	9/21/2018
WCJB	32134	12083	FL	MARION	N/A	No	9/21/2018
WCJB	32180	12083	FL	MARION	N/A	No	9/21/2018
WCJB	32702	12083	FL	MARION	N/A	No	9/21/2018
WCJB	32784	12083	FL	MARION	N/A	No	9/21/2018